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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

AMANDA LUNDBOM, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SCHWAN'S HOME SERVICE, INC.; and
SCHWAN'S COMPANY,

Defendants.

NO. 3:18-cv-02187-SI

**DECLARATION OF FRANK S. HEDIN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT ON
DEFENDANTS' AFFIRMATIVE
"EXPRESS WRITTEN CONSENT"
DEFENSE TO PLAINTIFF'S FIRST
CLAIM FOR RELIEF**

Honorable Michael H. Simon

CLASS ACTION

I, Frank S. Hedin, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 and based on my own personal knowledge, that the following statements are true:

1. I am one of the attorneys of record for plaintiff Amanda Lundbom and the proposed class in this action, and I submit this declaration in support of plaintiff's Motion for Summary Judgment on Defendant's "Express Written Consent" Defense to Plaintiff's First Claim for Relief;

2. Attached as Exhibit "A" hereto is a true and correct copy of the transcript of the June 6, 2019 deposition of Amanda M. Lundbom and accompanying exhibits.

3. Attached as Exhibit "B" hereto is a true and correct copy of the transcript of the June 12, 2019 deposition of Maggie Pearthree, corporate representative for Defendants Schwan's Home Service, Inc. and Schwan's Company, and accompanying exhibits.

4. Attached as Exhibit "C" hereto is a true and correct copy of the transcript of the June 12, 2019 deposition of Paul Griebel, corporate representative for Defendants Schwan's Home Service, Inc. and Schwan's Company, and accompanying exhibits.

5. Attached as Exhibit "D" hereto is a true and correct photograph I took of a page from the account registration flow on Defendants' Schwans.com website, accessible at <https://www.schwans.com/account/?mode=create&from=rewards>, on August 2, 2019.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 2nd day of August, 2019 at Miami, Florida.

/s/ Frank S. Hedin
Frank S. Hedin